

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TANDALA MIMS                      *aka*  
TANDALA WILLIAMS                      *✧*  
  
Debtor

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**OBJECTION TO  
CONFIRMATION**

Chapter 13  
Case No. 10-14030-scc

Natalie A. Grigg, Esq., an attorney duly licensed to practice law in the State of New York and admitted in the Southern District of New York, affirms the following to be true, under penalty of perjury:

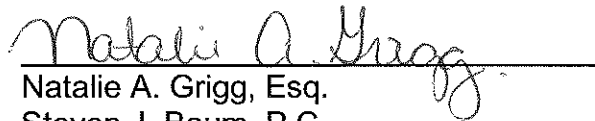
1. I am an associate with the firm of Steven J. Baum, P.C., attorneys for the Secured Creditor, Wells Fargo Bank, NA.
2. This Affirmation is submitted for the purpose of objecting to confirmation of the Chapter 13 Plan proposed by Tandala Mims (the "Debtor").
3. Wells Fargo Bank, NA is a creditor secured by real property commonly known as 1167 Grenada Place, Bronx, NY 10466, which is property owned by the Debtor.
4. The Debtor proposed Plan fails to list Wells Fargo Bank, NA and therefore fails to provide for pre-petition arrears and ongoing post-petition payments due to Wells Fargo Bank, NA. The Proof of Claim filed by Wells Fargo Bank, NA indicates pre-petition arrears owing in the amount of \$11,352.18. A copy of the filed Proof of Claim is attached hereto as Exhibit A. As the Debtor's plan fails to provide for payment of these arrears, confirmation must be denied pursuant to 11 U.S.C. Section 1322(a)(2).

5. The Plan must propose to pay pre-petition arrears and post-petition mortgage payments in order for Wells Fargo Bank, NA to retain its lien.

6. The Debtor's proposed Plan provides for total plan payments in the amount of \$3,600.00, which falls short of full payment of Debtor's pre-petition arrears to Wells Fargo Bank, NA. Accordingly, Debtor's proposed plan is not feasible.

7. By virtue of the foregoing, confirmation of the Debtor's proposed Chapter 13 Plan must be denied pursuant to 11 U.S.C. §1325.

Dated: Buffalo, New York  
June 2, 2011

  
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